

REMARKS

Claims 4, 11, 12 and 14 have been rewritten in independent form to secure allowance of claims 4-7, 12, 12, 14 and 17.

The new reference cited against claim 1 is Vallet USP 4,791,985. The Examiner has found a better reference than Nobileau USP 4,903,776 which is now withdrawn. The Vallet reference secures a string 14 at the lower end to packer 16. As shown in Figure 2, with the packer 16 set a force is applied to hook 42 and the string is subjected to tension as the hanger 18 moves from the phantom line position to the Figure 3 position where pins 36 and 38 are manually advanced into groove 20 to secure the hanger. Thereafter additional pins 39 can be advanced, as shown in Figure 4 to further secure the hanger 18. What this reference doesn't do and can't do is to first secure the seal assembly to the wellhead and then apply and retain a tensile force. The Vallet reference depends on being able to reposition the hanger as tension is applied so that the hanger can be moved to the one and only position where it can be secured. Securing the hanger 18 in Vallet is simply not possible without applying tension first. The ability to secure the seals in claim 1 and then apply and retain the tension allows flexibility of selecting the amount of tension. Vallet must pull to get the hanger in one particular position and accept whatever stress level in the string from the tension force needed accomplishes the required hanger position in the wellhead. Claim 1 is not anticipated by Vallet.

As to claim 3 the Examiner incorrectly relies on seal retainer 26 for the structure in claim 3 that allows the seal assembly to be secured to the wellhead. In Vallet, the only structures that accomplish that task are the pins 36 and 38 operated in Figure 3 and for backup pins 39 operated in Figure 4. Claim 3 requires that the lock ring be allowed to


move before tension is applied. Passing over the issue that Vallet uses pins and a ring is claimed because both structures are considered equivalent, the reality is that in Vallet the pins cannot be actuated until after the tension is applied because otherwise they will not be able to secure the hanger to the wellhead. Claim 3 requires the lock ring to move to secure the seal assembly to the wellhead before pulling a tensile force. Vallet simply can't do this.

With regard to claim 10 the phrase "during or" has been removed from the claim to emphasize that the seal assembly is moved after the tension is applied. Vallet teaches a continuous pull until the hanger is in position to be pinned to the wellhead. When Vallet is done pulling, all he has left to do is actuate pins. He does not teach and has no use for moving the seals of the hanger when he's done pulling. In essence Vallet's hanger and its seals don't move when the pulling is done. That is what claim 10 requires. Claim 10 is not anticipated by Vallet.

Allowance of the remaining claims is requested.

Respectfully submitted,




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